IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

Dr. Regina Jordan-Sodiq,)	Case No.: 3:25-cv-00288
Plaintiff)	Judge Eli Richardson Jury Demand
)	
v.)	
State of Tennessee et. al.,)	
Defendants and Fifth Third)	
Bank, (Defendant)		

PLAINTIFF'S MOTION TO COMPEL DISCLOSURE OF HEARING DATE

AND REQUEST FOR DISCLOSURE OF HEARING DATE & REGISTERED AGENT INFORMATION

COMES NOW Plaintiff, Dr. Regina Jordan-Sodiq, and respectfully moves this Honorable Court for an order compelling Defendant Fifth Third Bank National Association to:

- Disclose the scheduled hearing date, time, and location for Defendant's pending Motion to Dismiss.
- Provide the correct registered agent's full name and address to facilitate proper service of process.

I. Defendant's Failure to Disclose Hearing Date Impedes Due Process

- Defendant has filed a Motion to Dismiss but failed to provide Plaintiff with a scheduled hearing date, thereby obstructing her ability to prepare an adequate response.
- Repeated attempts to obtain this information have been ignored, preventing Plaintiff
 from exercising her legal right to defend against Defendant's motion.
- 3. Due process requires transparency, and Defendant's refusal to provide the hearing details violates procedural fairness and warrants judicial intervention.

II. Defendant's Registered Agent Information is Unclear

- 1. Plaintiff has attempted multiple service efforts via Defendant's registered agent, but service was rejected due to incomplete or incorrect details.
- 2. Defendant must confirm the correct legal entity name and full registered agent details, ensuring compliance with Tennessee Rule 4.04(10) and other procedural requirements. Exhibit A: Wolters Kluwer's "Notice of Rejection Service of Process" -

Log # 548921468 and Exhibit B: Wolters Kluwer's "Notice of Rejection Service of Process" -Log # 549867097

- Certificate of Service Provided Plaintiff references the Certificate of Service from Katherine R. Rogers, counsel for Fifth Third Bank National Association, confirming proper service of Defendant's filings via CM/ECF and first-class U.S. mail on April 21, 2025.
- 4. Defendant's Registered Agent Confusion Obstructs Service:
 - Defendant's failure to identify the correct registered agent obstructs proper service and creates procedural uncertainty.
 - Judicial oversight is warranted to compel disclosure of this essential information, ensuring Plaintiff's ability to proceed with litigation.

III. Defendant's Motion to Dismiss with Prejudice is Unwarranted

Defendant's attempt to dismiss Plaintiff's claims with prejudice lacks legal merit:

- 1. Failure to state a claim argument is flawed Plaintiff's claims meet legal standards for harassment and procedural misconduct, warranting full consideration.
- Service of process objections lack grounds Defendant's assertion that service was insufficient is contradicted by Plaintiff's documented attempts and procedural compliance.
- 3. Bad-faith procedural tactics Defendant's efforts to stall litigation through obstruction, withheld information, and tactical delays warrant judicial scrutiny.
- 4. If missing exhibits are deemed essential, Plaintiff moves for leave to supplement any inadvertently omitted documents to ensure fair consideration and correct any errors.

IV. Addressing Defendant's Procedural Manipulation

Defendant seeks to limit judicial review by excluding new factual allegations and exhibits from consideration. Their key arguments:

- 1. Improper introduction of new claims Defendant argues Plaintiff cannot introduce additional factual allegations in opposition to their Motion to Dismiss.
- Exclusion of newly introduced exhibits Defendant seeks to bar consideration of exhibits not originally attached, despite their relevance.

Countering Defendant's Arguments

- Plaintiff's allegations support existing legal claims, making them admissible evidence rather than improper new claims.
- Case Law Precedent: Courts permit further factual clarification during opposition motions, negating Defendant's exclusion attempt.
- If certain exhibits were omitted, Plaintiff moves for leave to supplement, ensuring procedural fairness.
- Defendant's efforts to block evidence highlight systematic procedural obstruction, reinforcing the necessity of judicial oversight.

V. Relief Requested

WHEREFORE, Plaintiff respectfully requests this Honorable Court to:

- Compel Defendant to disclose the hearing date, time, and location for its pending Motion to Dismiss.
- Require Defendant to confirm its registered agent's full name and address, ensuring proper service.
- Permit Plaintiff to supplement missing exhibits if deemed necessary for judicial review.

Grant any further relief deemed just and equitable to prevent procedural obstruction

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2025, a true and correct copy of Plaintiff's Response in Opposition to Defendants' Motion to Dismiss and Motion to Compel Disclosure of Hearing Date and Registered Agent Information, along with accompanying exhibits, was served via electronic filing upon the following:

Defendants' Counsel: Katherine R. Rogers, Burr & Forman, LLP; email: krogers@burr.com

Pursuant to the Tennessee Rules of Civil Procedure, electronic service of this filing is deemed proper and effective.

Submitted this 5th day of May, 2025

Dr. Regina Jordan-Sodiq, Pro Se Plaintiff 1757 Autumnwood Blvd Clarksville, TN 37042

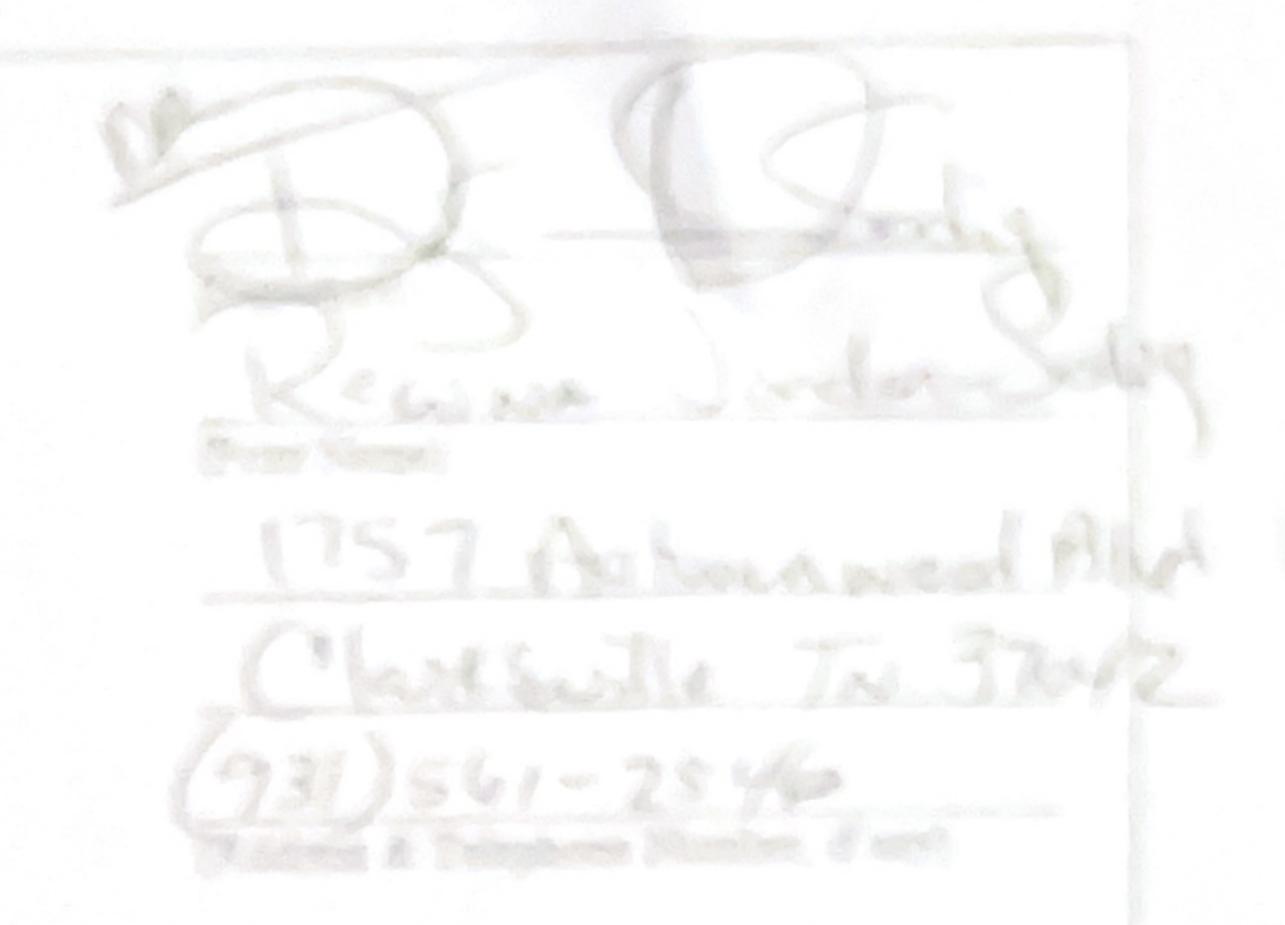
IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

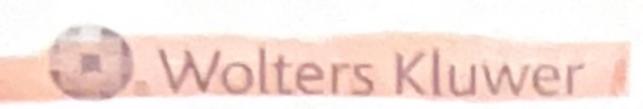
Plaintiff(s), v. State & Tennessee et.al., Defendant(s). and Fifth Third Banks Defendants Response to (Type of	Case Number Case No: 3:25-CV- Judge Judge Sir Richard Sa Magistrate Judge Surry Demond Motion to Dismiss Pleading)
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April 18, 2025

Exhibit - A

Notice of Rejected Service of Process - Log# 548921468

Agent Served: C T Corporation Party Served: Fifth Third Bank Jurisdiction Served: Tennessee Date of Service: April 17, 2025

Title of Action: Dr. Regina Jordan-Sodiq, Pro vs. Fifth Third Bank

Case No. 325CV00288-

Dear Sir/Madam:

We have received documents from you in the above-referenced matter, but we are not able to forward the documents to any party due to the reason indicated below.

Not Agent: According to our records and/or the records of the Secretary of State, we are not the registered agent for the party you are attempting to serve.

Documents Do Not Correctly Identify the Intended Recipient: The name of the party that you are trying to serve appears to be incomplete and/or there are other errors in how you have identified the party that you are trying to serve. Our company is the registered agent for service of process for hundreds of thousands of entities, and because of your errors in identifying the party that you are trying to serve, we are unable to determine the identity of the party that you are attempting to serve.

Inactive Entity: The entity that you are attempting to serve is either discontinued on our records and/or inactive with the Secretary of State. Accordingly, we no longer have any active agreement with the entity to

To be clear, for the aforementioned reason(s), we have not been able to forward the documents that you are attempting to serve to any party. We are writing this letter to you so that you can take action to address the problems that we have identified. If you do not correct the errors identified herein, the party you are trying to serve will not receive notice of these documents.

operate as its registered agent for service of process, and we no longer have current delivery instructions on file.

Please email SOPInquiries@wolterskluwer.com if you believe that you have received this letter in error or if you need further assistance.

(Returned To)

DR. REGINA JORDAN-SODIQ 1757 Autumnwood Blvd, Clarksville, TN 37042



April 24, 2025

Notice of Rejected Service of Process - Log# 548967097

Exhibit-13

Agent Served: CT Corporation
Party Served: Fifth Third-Bank
Jurisdiction Served: Tennessee
Date of Service: April 23, 2025

Title of Action: Dr. Regina Jordan-Sodiq vs. State of Tennessee

Case No. 325CV00288

Dear Sir/Madam:

We have received documents from you in the above-referenced matter, but we are not able to forward the documents to any party due to the reason indicated below.

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(Returned To)

Dr. Regina Jordan-Sodiq 1757 Autumnwood Blvd., Clarksville, TN 37042